

Exhibit D

Potential Enforcement of the Bulky Item Provision on July 1, 2020

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Tue 6/30/2020 8:53 PM

To: Gabriel Dermer <gabriel.dermer@lacity.org>; Felix Lebron <felix.lebron@lacity.org>; Patricia Ursea <patricia.ursea@lacity.org>

Cc: Cathy Sweetser <catherine.sdshhh@gmail.com>; Onufer, Michael <michael.onufer@kirkland.com>; Herbert, Benjamin Allen <benjamin.herbert@kirkland.com>

Counsel,

We have learned that a number of individuals in the Venice area of Los Angeles have been told by LA Sanitation employees that the City intends to resume seizing bulky items tomorrow, July 1, during the weekly cleanup that occurs at Frederick and Rose. Specifically, we understand City employees have said that Sanitation has been given permission to remove all bulky items in the area. This evening, we discovered that the signs shown in the attached photo have been posted on Rose Avenue near individuals' tents.

As you know, the City is currently enjoined from seizing and destroying Bulky Items and from posting signs indicating it intends to do so. Removing all Bulky Items from an encampment would violate the injunction, and of course, posting these notices, if the City did in fact post them, would violate the injunction as well.

Please let us know immediately the City's position on this matter. We request you let us know if anyone in the City had anything to do with the posting of these notices. Moreover, it is our expectation that the City does not intend to remove bulky items, which would violate the Court's order. If it is the City's intention to resume seizing bulky items, please notify us immediately. We request the City refrain from doing so until the parties can meet and confer, and the Plaintiffs can seek further court intervention if necessary.

We look forward to hearing from you.

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